

THIS SPACE FOR BXA USE

781577

REPORT OF REQUEST FOR RESTRICTIVE TRADE PRACTICE OR BOYCOTT  
MULTIPLE TRANSACTIONS (Sheet No. 1)

(For reporting requests described in 769 of the Export Administration Regulations)

## NOTICE OF RIGHT TO PROTECT CERTAIN INFORMATION FROM DISCLOSURE.

The Export Administration Act permits you to protect from public disclosure information regarding the quantity, description, and value of the commodities or technical data supplied in Item 9 of this report and in any accompanying documents. *If you do not claim this protection, all of the information in your report and in accompanying documents will be made available for public inspection and copying.* You can obtain this protection by certifying, in Item 5 of the report, that disclosure of the information regarding the quantity, description and value of the commodities or technical data referred to above would place a United States company or individual involved in the report at a competitive disadvantage. If you make such a certification in Item 5, you may remove information regarding the quantity, description, and value of the commodities or technical data supplied by you from Item 9 of the public inspection copy of the report form and from the public inspection copies of the accompanying documents. The withholding of this information will be honored by the Department unless the Secretary determines that disclosure of the information would not place a United States company or individual at a competitive disadvantage or that it would be contrary to the national interest to withhold the information.

**A** 1 BATCH 2 5  
MONTH/YEAR 1 298 6 9

This report is required by law (50 U.S.C. App. §2403-1a(b); P.L. 95-52; E.O. 12002; 15 CFR Part 769). Failure to report can result both in criminal penalties, including fines or imprisonment, and administrative sanctions.

**INSTRUCTIONS:** 1. This form may not include a transaction report that is filed late, nor indicate a decision on request other than those coded in Item 4 below. 2. This form may be used to report on behalf of another United States person if all transactions apply to the person identified in Item 2, but may not be considered as a dual report on behalf of both persons identified in Item 1a and Item 2. 3. Limit each report to 75 transactions or less. 4. Attach as many continuation sheets as needed. Enter sheet number and name of reporting firm on each continuation sheet (starting with Sheet No 2). 5. List each transaction across the continuation sheet, completing all items that apply. Use as many lines as necessary but separate transactions with a blank space or line. 6. Assemble original report form and accompanying documents as a unit, and submit intact and unaltered. 7. Assemble and submit the duplicate copy of report form (marked Duplicate (Public Inspection Copy)) and additional copies of accompanying documents (marked with the legend "Public Inspection Copy.") 4. If you certify, in Item 5, that the disclosure of the information specified there would cause competitive disadvantage, edit the "Public Inspection Copy" of the documents submitted to exclude the specified information and remove the right hand portion of the Duplicate (Public Inspection Copy) of the continuation sheet(s) relating to Column 9. **MULTIPLE TRANSACTIONS:** Public reporting for this collection of information is estimated to average one hour per reported request, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Office of Security and Management Support, Bureau of Export Administration, U.S. Department of Commerce, Washington, D.C. 20230; and to the Office of Management and Budget, Paperwork Reduction Project (0694-0012), Washington, D.C. 20503.

## 1a. Identify firm submitting this report:

Name: Sun Company, Inc. (R&M)  
Address: 1801 Market Street  
City, State and ZIP: Philadelphia, PA 19103  
Country (if other than USA):  
Telephone: (215) 977-6000  
Firm Identification No. (if known)

## Specify firm type:

- ☐ Exporter  
☐ Bank  
☐ Forwarder  
☐ Carrier  
☐ Insurer  
☒ Other

## 1b. Check any applicable box:

- ☐ Revision of a previous report (attach two copies of the previously submitted report)  
☐ Resubmission of a deficient report returned by BTR (attach form letter that was returned with deficient report)  
☒ Report on behalf of the person identified in item 2

## 2. If you are authorized to report and are reporting on behalf of another U.S. person, identify that person (e.g., domestic subsidiary, controlled foreign subsidiary, exporter, beneficiary):

Name:  
Address:  
City, State and ZIP:  
Country (if other than USA):  
Type of firm: (see list in item 1a)

## 3. REQUESTING DOCUMENT CODES (use to code Column 6 of continuation sheet)

- C Request to carrier for blacklist certificate (submit two copies of blacklist certificate or transcript of request)  
U Unwritten, not otherwise provided for (make transcript of request and submit two copies)  
L Letter of credit  
R Requisition/purchase order/accepted contract/ shipping instruction  
B Bid invitation/tender/proposal/trade opportunity  
Q Questionnaire (not related to a particular dollar value transaction)  
9 Other written

Submit two copies of each document or relevant page in which the request appears.

## 4. DECISION ON REQUEST CODES (use to code Column 7 of continuation sheet)

- R Have not taken and will not take the action requested  
T Have taken or will take the action requested

## 5. Protection of Certain Information from Disclosure: (Check appropriate boxes and sign Below)

- ☒ I (we) certify that disclosure to the public of the information regarding quantity, description, and value of the commodities or technical data contained in:  
☒ Column 9 of the attached continuation sheets (If you check this box, be sure to remove column 9 from the Duplicate (Public Inspection Copy)) of the continuation sheets.  
☒ Attached documents (If you check this box, be sure to edit the "Public Inspection Copy" of the documents submitted to exclude the specified information.) would place a United States person involved at a competitive disadvantage, and I (we) request that it be kept confidential.  
☐ I (we) authorize public release of all information contained in the report and in any attached documents.  
I (we) certify that all statements and information contained in this report are true and correct to the best of my (our) knowledge and belief.

Sign here in ink

Type or print

Joseph D. Zulli

Date

October 28, 1998

Column		SHEET NO. 2 of 3		REPORT OF REQUEST FOR RESTRICTIVE TR MULTIPLE TRANSACTIONS (Co			
(2) Also enter firm identification number assigned to exporting firm, if known. (6) Use codes found on Sheet No. 1 to specify type(s) of document conveying the request. (7) Use codes found on Sheet No.1 to indicate whether action taken or not taken. (8) Enter reporting firm's reference number (e.g., letter of credit, customer order, invoice). This number must appear on corresponding copy of document or relevant page. Attach copies in same order as listed on continuation sheet(s).		REPORTING FIRM (Name)					
		Sun Company, Inc. (R&M)					
RSN SUBSET RTP/CLASS OTHER PARTY FIN	NAME AND ADDRESS OF EXPORTING FIRM INVOLVED (unless same as item 1a or item 2 on Sheet No. 1)	BOYCOTTING COUNTRY	BOYCOTTED COUNTRY OR COUNTRIES	DATE REQUEST RECEIVED BY FIRM (month/day/year)	REQUEST- ING DOCUMENT CODE	DECISION ON REQUEST CODE	YOUR REFERENCE NUMBER
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
THIS SPACE IS NOT TO BE USED BY THE EXPORTING FIRM <b>NOT REPORTABLE</b>  <i>Reportable</i> <b>NOT REPORTABLE</b>  <i>Reportable</i> <b>NOT REPORTABLE</b>  <i>Reportable</i> <b>NOT REPORTABLE</b>	Reporting firm is not an exporting firm under these transactions.	Angola	None Specified	7/2/98	R	T	306868
		Angola	None Specified	7/7/98	R	T	306874
		Nigeria	South Africa Israel Namibia	7/8/98	R	T	306879
		Congo	None Specified	7/9/98	R	T	306882
		Nigeria	South Africa Israel Namibia	7/20/98	R	T	306911
		Nigeria	None Specified	7/21/98	R	T	306918
		Nigeria	South Africa Israel Namibia	7/29/98	R	T	306957
		Gabon	None Specified	7/31/98	R	T	306962
		Columbia	None Specified	8/10/98	R	T	306973
		Angola	None Specified	8/14/98	R	T	306987
	Nigeria	None Specified	8/14/98	R	T	306988	

(Remove stub from public inspection copy at perforation if confidentiality is requested in Sheet No. 1)

DATE: 21 AUG 1998

TO:

SUN REF: 306957

2. BUYER:
4. DELIVERY:
6. PAYMENT:
7. NOMINATIONS:
10. QUANTITY/QUALITY DETERMINATION:
11. DEMURRAGE:
12. DISCHARGE CERTIFICATE:
13. LIMITATION OF DAMAGES:
15. GOVERNING LAW AND SETTLEMENT OF DISPUTES:

TO:

1. SELLER:

2. BUYER:

3. OIL:

4. DELIVERY:

5. PRICE:

6. PAYMENT:

7. NOMINATIONS:

8. VESSEL REQUIREMENTS:

\_9. INSPECTION:

10. QUANTITY/QUALITY DETERMINATION:

11. DEMURRAGE:

12. DISCHARGE CERTIFICATE:

13. LIMITATION OF DAMAGES:

14. HEALTH, SAFETY AND THE ENVIRONMENT:

15. GOVERNING LAW AND SETTLEMENT OF DISPUTES:

16. OTHER TERMS AND CONDITIONS: OTHER TERMS AND CONDITIONS GOVERNING THIS SALE SHALL BE IN ACCORDANCE WITH NNPC GENERAL TERMS AND CONDITIONS, HOWEVER, THAT WHENEVER THE GENERAL PROVISIONS ARE INCONSISTENT WITH THE PARTICULAR TERMS AND CONDITIONS SET FORTH ABOVE, THE LATTER SHALL GOVERN.

17. SELLER'S CONTACTS:

OPERATIONS:

FINANCIAL:

DEMURRAGE:

CONTRACTS:

AUGUST 19, 1998

TELEX NUMBER: 49617790

ATTENTION:

RE:

SUN CONTRACT NUMBER - 306957

/ 2. BUYER:

4. DELIVERY:

6. PAYMENT:

QUOTE:

UNQUOTE:

10. QUANTITY/QUALITY DETERMINATION:

11. DEMURRAGE:

12. DISCHARGE CERTIFICATE:

13. LIMITATION OF DAMAGES:

TITLE/RISK:

FORCE MAJEURE:

OPERATIONS:  
CONTRACTS:  
CREDIT:

GENERAL CONDITIONS OF SALE OF  
NIGERIAN CRUDE OIL

PART II OF THE CONTRACTS

19.

19.

19.

20.

PARAGRAPH 21 - PROHIBITED DESTINATIONS

21. The BUYER shall have and is hereby given an irrevocable right to export the said Nigerian crude oil to any country except South Africa, Israel, Namibia (South-West Africa) and any other country not specifically named herein to which the export of Nigerian crude oil may be prohibited from time to time by the Nigerian Government in its absolute discretion.

AUGUST 4, 1998

TELEX NUMBER:

ATTENTION:

SELLER:

BUYER:

CRUDE:

QUANTITY:

DELIVERY:

PRICE:

PAYMENT:

GOVERNING LAW: -----

GENERAL TERMS AND CONDITIONS:

NNPC'S LATEST GENERAL TERMS AND CONDITIONS.

JULY 31, 1998

FAX NUMBER:

ATTENTION:

RE:

SUN CONTRACT NUMBER - 306879

BUYER:  
INVOICE AND/OR LOI TO BE ADDRESSED TO:  
ATTENTION:

FAX NUMBER:  
TELEX NUMBER:

QUANTITY:

PAYMENT TERMS:

B)

B)

PAYMENT TERMS:

LAYTIME AND DEMURRAGE:

DEMURRAGE:

QUANTITY AND QUALITY:

LINE 9:

LAW AND JURISDICTION:

WARRANTIES:

PLEASE ADD THE FOLLOWING:  
ALL NOTICES TO BE SENT TO THE FOLLOWING:

FAX NUMBER:  
TELEX NUMBER:

PLEASE NOTE THE FOLLOWING CONTACTS:  
OPERATIONS:  
CONTRACTS:  
CREDIT:  
ACCOUNTING:

BEST REGARDS,

Y:\CONTRACT\306879A.WPD  
(AMD)

CC:

Author:  
Date:  
Priority:  
TO:  
Subject:

FROM:

TO:

DATE:  
TIME:  
SUBJECT:  
PRIORITY:

TO:

ATTN:

FROM:

RE:

SELLER  
-----

BUYER  
-----

CRUDE TYPE  
-----

QUANTITY

DELIVERY

-----

PRICE

-----

TAXES AND DUES

-----

PAYMENT TERMS

-----

LETTER OF INDEMNITY

-----

INVOICING

INDEPENDENT INSPECTION  
-----

LAYTIME AND DEMURRAGE  
-----

TITLE AND RISK OF LOSS  
-----

QUANTITY AND QUALITY  
-----

LAW AND JURISDICTION  
-----

WARRANTIES  
-----

ASSIGNMENT  
-----

OTHER TERMS AND CONDITIONS  
-----

WHERE NOT INCONSISTENT WITH THE ABOVE, NIGERIAN NATIONAL PETROLEUM  
CORPORATION TERMS AND CONDITIONS SHALL APPLY.

ENTIRE AGREEMENT  
-----

OPERATIONAL CONTACT:

GENERAL CONDITIONS OF SALE OF  
NIGERIAN CRUDE OIL

PART II OF THE CONTRACTS

19.

19.

19.

20.

PARAGRAPH 21 - PROHIBITED DESTINATIONS

21. The BUYER shall have and is hereby given an irrevocable right to export the said Nigerian crude oil to any country except South Africa, Israel, Namibia (South-West Africa) and any other country not specifically named herein to which the export of Nigerian crude oil may be prohibited from time to time by the Nigerian Government in its absolute discretion.

JULY 9, 1998

FAX NUMBER:

ATTENTION:

SELLER:  
BUYER:  
CRUDE:

QUANTITY:

DELIVERY:

PRICE:

PAYMENT:

INSPECTION:

GENERAL TERMS AND CONDITIONS:

NNPC'S LATEST GENERAL PROVISIONS WITH THE INCORPORATION  
OF ENGLISH LAW, WITH NO RECOURSE TO ARBITRATION.

SEPTEMBER 3, 1998

FAX NUMBER:

ATTENTION:

RE:

SUN CONTRACT NUMBER - 306911

6. OTHER COSTS:

9. LIABILITY:

PART II - GENERAL PROVISIONS:

ATTN:

COPY TO:

ATTN:

AUGUST 27, 1998

(YOUR REF. 306911)

6. OTHER COSTS: \

9. LIABILITY:  
-----

PART II - GENERAL PROVISIONS:

AUGUST 21, 1998

FAX NUMBER:

ATTENTION:

RE:

SUN CONTRACT NUMBER - 306911

6. OTHER COSTS:

9. LIABILITY:

PART II - GENERAL PROVISIONS:

FROM:

ATTN

COPY TO:

AUGUST 18, 1998

1. BUYER:

5. PAYMENT:

6. OTHER COSTS:

8. QUANTITY/ QUALITY AND INSPECTION:

9. LIABILITY:

PART II - GENERAL PROVISIONS:

NNNN

-TO:

FROM:

COPY TO:

JULY 30, 1998

PART I - SPECIFIC PROVISIONS:

1. PARTIES:

2. QUANTITY AND QUALITY:

3. DELIVERY:

4. PRICE:

5. PAYMENT:

6. OTHER COSTS:

7. CLAIMS (INCLUDING DEMURRAGE):

8. QUANTITY/ QUALITY AND INSPECTION:

9. LIABILITY:

10. CONTACTS:

PART II - GENERAL PROVISIONS:

WHERE NOT INCONSISTENT WITH THE FOREGOING NNPC'S GENERAL TERMS AND  
CONDITIONS OF SALE OF NIGERIAN CRUDE OIL AS UPDATED FROM TIME TO  
TIME SHALL APPLY.

GENERAL CONDITIONS OF SALE OF  
NIGERIAN CRUDE OIL

PART II OF THE CONTRACTS

19.

19.

19.

20.

PARAGRAPH 21 - PROHIBITED DESTINATIONS

21. The BUYER shall have and is hereby given an irrevocable right to export the said Nigerian crude oil to any country except South Africa, Israel, Namibia (South-West Africa) and any other country not specifically named herein to which the export of Nigerian crude oil may be prohibited from time to time by the Nigerian Government in its absolute discretion.

AUGUST 12, 1998

FAX NUMBER:

ATTENTION

RE:

SUN CONTRACT NUMBER - 306911

PART I - SPECIFIC PROVISIONS:

BUYER:

5. PAYMENT:

QUOTE:

UNQUOTE:

6. OTHER COSTS:

8. QUANTITY / QUALITY AND INSPECTION:

9. LIABILITY:

PART II - GENERAL PROVISIONS:

WE AGREE TO NNPC'S LATEST CONDITIONS OF SALE OF NIGERIAN CRUDE OIL WITH THE INCORPORATION OF THE FOLLOWING MODIFICATIONS:

PLEASE ADD:

DEMURRAGE:

GOVERNING LAW:

FORCE MAJEURE:

OUR CONTACTS ARE AS FOLLOWS:

OPERATIONS:

CONTRACTS:

CREDIT:

FROM:

TO:

DATE:

TIME:

SUBJECT:

PRIORITY:

TO

ATTN

QUOTE

RE:

UNQUOTE

JULY 22, 1998

FAX NUMBER:

ATTENTION:

SELLER:

BUYER:

CRUDE:

QUANTITY:

DELIVERY:

PRICE:

PAYMENT:

GENERAL TERMS AND CONDITIONS:

NNPC'S LATEST GENERAL TERMS AND CONDITIONS.

- Column (2) Also enter firm identification number assigned to exporting firm, if known.  
 (6) Use codes found on Sheet No. 1 to specify type(s) of document conveying the request.  
 (7) Use codes found on Sheet No.1 to indicate whether action taken or not taken.  
 (8) Enter reporting firm's reference number (e.g., letter of credit, customer order, invoice). This number must appear on corresponding copy of document or relevant page. Attach copies in same order as listed on continuation sheet(s).


SHEET NO. 3 of 3

FORM BXA-6051P-2  
 (Rev. 10-89)

REPORTING FIRM (Name)

Sun Company, Inc. (R&M)

REPORT OF REQUEST FOR RESTRICTIVE TF  
 MULTIPLE TRANSACTIONS (Co

RSN SUBSET RTP/CLASS OTHER PARTY FIN  (1)	NAME AND ADDRESS OF EXPORTING FIRM INVOLVED <i>(unless same as item 1a or item 2 on Sheet No. 1)</i>  (2)	BOYCOTTING COUNTRY  (3)	BOYCOTTED COUNTRY OR COUNTRIES  (4)	DATE REQUEST RECEIVED BY FIRM (month/day/year)  (5)	REQUEST- ING DOCUMENT CODE  (6)	DECISION ON REQUEST CODE  (7)	YOUR REFERENCE NUMBER  (8)
THIS SPACE FOR BXA USE <b>NOT REPORTABLE</b> <i>Reportable</i> <b>NOT REPORTABLE</b> 	Reporting firm is not an exporting firm under these transactions.	Nigeria	None Specified	8/17/98	R	T	306990
		Nigeria	South Africa Israel Namibia	8/18/98	R	T	306991
		Angola	None Specified	9/16/98	R	T	307066
		U.K.	None Specified	9/16/98	R	T	307068
		Algeria	None Specified	9/21/98	R	T	307078
		Angola	None Specified	9/21/98	R	T	307081
		Nigeria	None Specified	9/25/98	R	T	307118
		Norway	None Specified	9/29/98	R	T	307122

(Remove stub from public inspection copy at perforation if confidentiality is requested in Sheet No. 1)

SEPTEMBER 8, 1998

TELEX NUMBER:

-----  
ATTENTION

CC:

RE:

SUN CONTRACT NUMBER - 306991

BUYER:

4. QUANTITY:

6. DUES:

8. PAYMENT:

QUOTE

UNQUOTE:

10. LAW AND COURT:

11. QUANTITY AND QUALITY: \_

12. LAYTIME AND DEMURRAGE:

DEMURRAGE:

13. TITLE AND RISK:

-----  
OPERATIONS:  
CONTRACTS:  
CREDIT:  
ACCOUNTING:

Author:  
Date:  
Priority:  
TO:  
Subject:  
-----

TO:

CC:

RE:

1. SELLER:

2. BUYER:

3. QUALITY:

4. QUANTITY:  
-----

5. DELIVERY AND NOMINATION:

6. DUES:

7. PRICE:

8. PAYMENT:

9. INSPECTION:

10. LAW AND COURT:

11. QUANTITY AND QUALITY:

12. LAYTIME AND DEMURRAGE:

14. OTHER TERMS AND CONDITIONS:

WHERE NOT SPECIFICALLY COVERED BY THE ABOVE, THIS CONTRACT  
SHALL BE SUBJECT TO NNPC GENERAL TERMS AND CONDITIONS  
(LATEST EDITION)

15. NOTICES:

REGARDS

AUGUST 19, 1998

FAX NUMBER:

ATTENTION:

SELLER: -----  
BUYER:  
CRUDE:

DELIVERY:

QUANTITY:

PRICE:

PAYMENT:

INSPECTION:

GOVERNING LAW:

GENERAL TERMS AND CONDITIONS: NNPC'S LATEST PROVISIONS SHALL  
APPLY.

GENERAL CONDITIONS OF SALE OF  
NIGERIAN CRUDE OIL

PART II OF THE CONTRACTS

19.

19.

19.

20.

PARAGRAPH 21 - PROHIBITED DESTINATIONS

21. The BUYER shall have and is hereby given an irrevocable right to export the said Nigerian crude oil to any country except South Africa, Israel, Namibia (South-West Africa) and any other country not specifically named herein to which the export of Nigerian crude oil may be prohibited from time to time by the Nigerian Government in its absolute discretion.